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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

WELLTON INTERNATIONAL EXPRESS,  
WELLTON EXPRESS INC,

Case No.: 19 cv 6834 (JPO)

Plaintiffs,

- against -

BANK OF CHINA (HONG KONG),  
JP MORGAN CHASE BANK,  
WELLS FARGO BANK PLC and JOHN DOE  
and/or JANE DOE 1 THROUGH 10,

**NOTICE OF MOTION**

Defendants.

TAKE NOTICE, that upon the Declaration of Ronald M. Neumann dated August 15, 2019, and the exhibits thereto, the accompanying Memorandum of Law and all pleadings and proceedings heretofore had herein, defendant Wells Fargo Bank, N.A., sued incorrectly herein as Wells Fargo Bank PLC (“Wells Fargo”), shall make a motion before the Honorable J. Paul Oetken, at the United States Courthouse for the Southern District of New York, 40 Foley Square, New York, New York 10007, for an order pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure:

1. dismissing plaintiffs' complaint dated May 29, 2019 and filed on or about May 29, 2019 as against Wells Fargo in its entirety and with prejudice; and
2. for such other and further relief as is just and proper.

Dated: New York, New York  
August 15, 2019

Respectfully submitted,

ZEICHNER ELLMAN & KRAUSE LLP

By:   
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